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Ethyl Corporation
19th Floor Ethyl Tower
451 Florida Blvd.
Baton Rouge, LA 70801
Attn: Mr. C. E. Coulton III

Dear Mr. Coulton:

As you requested this letter serves to expand upon the information provided in our previous report for samples ALD 2041-ALD2045 by enumerating the types of compounds that are amenable to the VOA Scan procedure used for analysis. The procedure is based upon EPA Methods 601/602 for purgeable halocarbon and aromatic compounds and also incorporates a flame ionization detector (FID) as a general purpose detector for compounds that are not detectable by the Hall Electrolytic Conductivity Detector (HECD) or a Photoionization Detector (PID) specified in the EPA methods.

The general criteria for compounds that will purge under the conditions of analysis are that their boiling point (BP) should be ≤ 200 C with their aqueous solubility not exceeding 2% (Note: Even if these criteria are exceeded many compounds will still be observed although exhibiting a reduced purge efficiency). Based on these criteria the list of compounds that would respond to the analytical conditions is easily in the thousands or tens of thousands. With this in mind the attached lists represent only a small portion of possible compounds that if present, would have been observed. These lists are significant in that they contain many of the regulated compounds from various state and federal programs. In addition the lists include a number of common industrial chemicals that are not classified under any particular regulatory guidelines but are an allied concern.

Regarding the question whether the presence of the THF would interfere with or precluded the detection of any other compounds let me say that based on my experience it would be very unlikely. The levels observed were simply not high enough to present any matrix interferences.

I hope that this additional information provides a clearer understanding of the test data and if you need any further assistance please feel free to contact me.

Respectfully,

Larry J. Frantz
Technical Director

LF:AKd ✓cc: Ms. Virginia Lebell (MT, DNR)